

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

As representative of

THE COMMONWEALTH OF PUERTO  
RICO, *et al.*,

Debtors<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

Re: ECF No. 24050

***DANOSA CARIBBEAN INC.'S SECOND UNCONTESTED URGENT MOTION TO  
EXTEND DEADLINE TO FILE A RESPONSE TO THE TO THE FIVE HUNDRED  
SEVENTIETH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH  
OF PUERTO RICO, THE EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO  
HIGHWAYS AND TRANSPORTATION AUTHORITY, AND PUERTO RICO PUBLIC  
BUILDINGS AUTHORITY TO CLAIMS FOR WHICH THE DEBTORS ARE NOT  
LIABLE***

COMES NOW, Danosa Caribbean Inc. (“DCI”), by and through the undersigned legal counsel, and after meeting and conferring with Debtors’ counsel respectfully submits this second urgent uncontested motion (the “Second Urgent Motion”) to extend the deadline for DCI to file a response to *Five Hundred Seventieth Omnibus Objection (Substantive) Of The Commonwealth Of Puerto Rico, The Employees Retirement System Of The Government Of The Commonwealth Of Puerto Rico, The Puerto Rico Highways And Transportation Authority, And Puerto Rico Public Buildings Authority To Claims For Which The Debtors Are Not Liable* (the “Five Hundred Seventieth Omnibus Objection”). See Dkt. No. 24050.

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

## **BACKGROUND**

1. DCI filed its Proof of Claim asserting the amount of \$108,926.02 on June 27, 2018 (the “Proof of Claim”). *See* Claim Number 56478.
2. On April 20, 2023, Debtors filed the Five Hundred Seventieth Omnibus Objection requesting the disallowance of DCI’s Proof of Claim. *See* Dkt. No. 24050.
3. DCI’s deadline to respond to the Five Hundred Sixty-Ninth Omnibus Objection was originally set for May 22, 2023. *See Id.* at 1.
4. However, on May 19, 2023, DCI filed an uncontested motion to extend the deadline for DCI to file a response to the Five Hundred Sixty-Ninth Omnibus Objection. *See* Dkt. No. 24272.
5. On May 22, 2023, the Court entered an *Order* granting DCI’s request for extension. *See* Dkt. No. 24282. As a result, DCI’s response is now due today, June 22, 2023 (the “Response Deadline”). *See Id.*

## **RELIEF REQUESTED**

1. Although the undersigned counsel have diligently employed significant efforts to familiarize themselves with the Proof of Claim and to prepare an adequate response to the Five Hundred Seventieth Omnibus Objection; additional time is necessary to finalize these tasks.
2. Counsel for DCI met and conferred with counsel for Debtors today, June 22, 2023, to inform that it would be filing the instant Second Urgent Motion requesting an additional 30-day extension to file a response to the Five Hundred Seventieth Omnibus Objection and to ascertain whether they had an objection to said request. Debtors counsel informed that they did not.
3. DCI respectfully requests, on an urgent basis, that the Court grant it an additional 30-day extension to file its response to the Five Hundred Seventieth Omnibus Objection, which

extension shall commence from the Response Deadline of June 22, 2023, and would be due on July 22, 2023.

#### **COMPLIANCE WITH CASE MANAGEMENT PROCEDURES**

4. Pursuant to Paragraph I.H of the *Sixteenth Amended Notice, Case Management and Administrative Procedures* Order (Docket No. 20190-2 of Case No. 17-03283 (LTS)) (the “CMP Order”), DCI hereby certifies that it has (a) carefully examined the matter and concluded that there is a true need for an urgent decision; (b) not created the urgency through any lack of due diligence; and (c) reasonable, good-faith communications took place with the parties to this adversary proceeding to resolve or narrow the issues before the Court. Specifically, counsel for DCI reached out to counsel for Debtors on June 22, 2023, who informed that they did not have an objection to DCI’s additional 30-day extension request.

**WHEREFORE**, DCI hereby requests, on an urgent basis, that the Court (i) enter an order substantially in the form attached hereto as **Exhibit A** granting it an additional 30-day extension, until July 22, 2023, to file its response to Five Hundred Seventieth Omnibus Objection; and (ii) enter any other relief that is just or appropriate given the circumstances.

#### **RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22nd day of June 2023.

**CERTIFICATE OF SERVICE:** In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court’s CMP Order, we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

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